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NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail - Return Receipt Requested

April 19, 2018

Sam Yildirim
Director
CommScope Connectivity, LLC
101 Lindbergh
Santa Teresa, NM 88008

Re: **CommScope Connectivity, LLC; MSGP; SIC 4226; NPDES Compliance Evaluation Inspection;
NPDES #NMR053397; March 20, 2018**

Dear Mr. Yildirim:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, detailed site observations, and findings noted during this inspection are discussed in the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Robert Houston
US Environmental Protection Agency, Suite 1200
Enforcement Branch (6EN-WS)
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

Cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Robert Houston, USEPA (6EN-WS) by e-mail
Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Mike Kesler, NMED District III by e-mail
Rhonda Gilbertson, CommScope by e-mail



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [N] 2 [5] 3 [N] [M] [R] [0] [5] [3] [3] [9] [7]	11 [1] [8] [0] [3] [2] [0]	17 [~]	19 [S]	20 [2]	
Remarks					
[S] [E] [C] [T] [O] [R] [P] [L] [A] [N] [D] [T] [R] [A] [N] [S] [P] [O] [R] [T] [A] [T] [I] [O] [N]					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 [] [] [] 69	70 [3]	71 [N]	72 [N]	73 [] [] []	74 75 [] [] [] [] [] [] 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 2:15 pm 3/20/18	Permit Effective Date 6-4-2015
CommScope Connectivity, LLC 101 Lindbergh Santa Teresa, NM88008 Dona Ana County	Exit Time/Date 4:15 pm 3/20/18	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Rhonda Gilbertson/EHS Coordinator /575-874-5446	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Sam Yildirim/Director 101 Lindbergh Santa Teresa, NM88008	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	SIC CODE: 4226 Special Warehousing and Storage

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. See attached report.

Name(s) and Signature(s) of Inspector(s) Jennifer Foote /s/ Jennifer Foote	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0596	Date 4-18-18
Signature of Management QA Reviewer Sarah Holcomb, Program Manager /s/ Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 4-18-18

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Jennifer Foote
NPDES ID Number	NMR053397	Telephone	505-827-0596
Inspection Date	3/20/18	Entry Time	2:15 PM
Inspector Type (circle one)	<input type="checkbox"/> EPA <input checked="" type="checkbox"/> State <input type="checkbox"/> EPA Oversight	Exit Time	4:15 PM
Facility Sector/ SIC/Activity Code	Sector P SIC 4226	Signature	<i>/s/ Jennifer Foote</i>

Facility Location Information				
Name/Location/ Mailing Address	CommScope Connectivity, LLC 101 Lindbergh Santa Teresa, NM88008			
GPS Coordinates	Latitude	31.86748	Longitude	106.69941
Receiving Water(s)	Rio Grande, Segment number 20.6.4.101			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Sam Yildirim Director	575-874-5446
Facility Contact	Rhonda Gilbertson Juan Mata	575-874-5446 575-874-5446
Authorized Official(s)	Sam Yildirim Director	575-874-5446

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Permit Type	<input checked="" type="checkbox"/> General	<input type="checkbox"/> Individual	SWPPP Contents Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Operational Date	Incorporated in New Mexico in 2000		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
NOI/Application Date	5/31/16		SWPPP Date	5/31/16	
If applicable, is no exposure certification on file?	<input type="checkbox"/> Y	<input type="checkbox"/> N <input checked="" type="checkbox"/> N/A	<i>Intentionally left blank</i>		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General		Notes:	
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	NOI and SWPPP certified 5/31/16 by Rhonda Gilbertson EHS Coordinator. EHS Coordinator is not a responsible corporate officer as described in Appendix B.11 of the permit.
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Report included was not the complete USFWS review required per Appendix E of the permit.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No consultation with the state SHPO occurred as required per Appendix F of the permit.
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Team members were updated 3/22/18.
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Staff were unclear on responsibilities for visual inspections.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Receiving waters not identified on maps.
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	See photo 1
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP does not discuss if waters are impaired or have TMDLs.
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Site map shows only one of the two curb outlets and does not show the outlet of the detention pond. (Photo 1, 2, 4)
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Map does not show locations of potential pollutants
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations of all storm water monitoring points?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Site map shows only one of the two curb outlets and does not show the outlet of the detention pond.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Site map shows only one of the two curb outlets and does not show the outlet of the detention pond.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Map does not show storm sewer location.
Does the site map contain locations and descriptions of all non-storm water discharges?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility • Transfer areas for substances in bulk • Machinery 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Diesel generators not shown on the map.</p> <p>Loading/unloading areas not on map.</p> <p>Locations of outdoor storage not on map.</p>
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	There is flow to the pond from Lindberg Drive, it is not discussed/shown.
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan includes a general list but not specific items at this facility. Pollutant log is blank, photo 2.
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	However it includes items that do not occur on site such as vehicle, equipment, and parts washing.
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> Date Description of evaluation criteria List of the outfalls or onsite drainage points directly observed Different types of non-storm water discharges and source locations Actions taken such as a list of control measures for elimination. 	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Non-stormwater assessment was performed 4/26/16
Does salt storage occur at this facility?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	N/A
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Location of spill kit not documented
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No information on site specific selection and design.
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan states "Good housekeeping practices must include a schedule for regular pickup and disposal..." The actual schedule is not described.
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Facility has a detention pond. It is called a retention pond in the plan, but it has a storm drain in the bottom so it does not retain water.
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan states N/A.
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Schedule is in the SWPPP. However training has not been conducted over the past two years. As of 4/16/18, it is scheduled to occur on April 19, 2018
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No training has been conducted.
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>			Notes:
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Inspections are conducted by subcontractor Environmental & Safety Solutions and certified by the facility.
Are inspections documented, including: <ul style="list-style-type: none"> Date and time Name and signature of inspector Weather information and a description of discharge occurring at the time of the inspection Previously unidentified discharges from site Control measures needing maintenance or repairs Failed control measures that need replacement Incidents of noncompliance observed Additional control measures needed. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Inspection only gives quarter of inspection and date it was certified, not date and time inspection was conducted. No weather information. Inspection states that "the next qualifying rain event shall be recorded" but does not state by who. No documentation of a routine inspection occurring during a discharge as required by Part 3.1 of the permit.
Exceptions, including: <ul style="list-style-type: none"> Inactive and unstaffed sites 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Annual report stated "Visual assessments are performed by trained facility personnel (PPT) and third party environmental consultant will review the findings to provide facility management with accurate professional guidance where corrective measures may be required. Visual assessments are discussed with operations manager, corrective measures are relayed to the facility staff for corrective actions and documented (hard copy) into the WP3." However, facility personnel were not aware that Visual Assessments needed to be conducted.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> Within the first 30 minutes of discharge On discharges that occur at least 72 hours (3 days) from the previous discharge Collected in a clean, clear glass or plastic container. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No visual assessments were completed.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No visual assessments were completed.
Exceptions, including : <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls • Inactive and unstaffed sites. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Exceptions for adverse weather conditions or irregular runoff were not documented. Substantially identical outfalls were not identified, only one of two outfalls is identified.
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A removed from 2015 MSGP Permit Requirements
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Cover all areas of the facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Include observations of the following: <ul style="list-style-type: none"> • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

<ul style="list-style-type: none"> Control measures needing replacement, maintenance, or repair All storm water control measures observed. 			
Are inspections documented, including: <ul style="list-style-type: none"> Date of inspection Names and titles of personnel making the inspection Findings from examination of areas of facility from Part 4.3.1 All observations relating to implementation of control measures Any required revisions to the SWPPP resulting from inspection Any incidents of noncompliance identified OR certification that facility is in compliance with the permit A statement signed in accordance with Appendix B, Subsection 11 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A for Sector P
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Benchmark Monitoring			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> Within the first 30 minutes of discharge On discharges that occur at least 72 hours from the previous discharge Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall Prior to commingling. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? <ul style="list-style-type: none"> Make the necessary modifications Continue quarterly monitoring Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Exceptions, including (see 6.1 & 6.2): <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Effluent Limitations Monitoring			
Sampled once per year?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Reporting (Part 7)			
<u>General</u>		Notes:	
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Annual reports submitted 1/23/2018 and 1/28/2017
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Majority of areas have minimal exposure to stormwater.</p>
Good Housekeeping	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>The site was orderly.</p>
Preventative maintenance	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>Facility is inspected quarterly for stormwater concerns.</p>

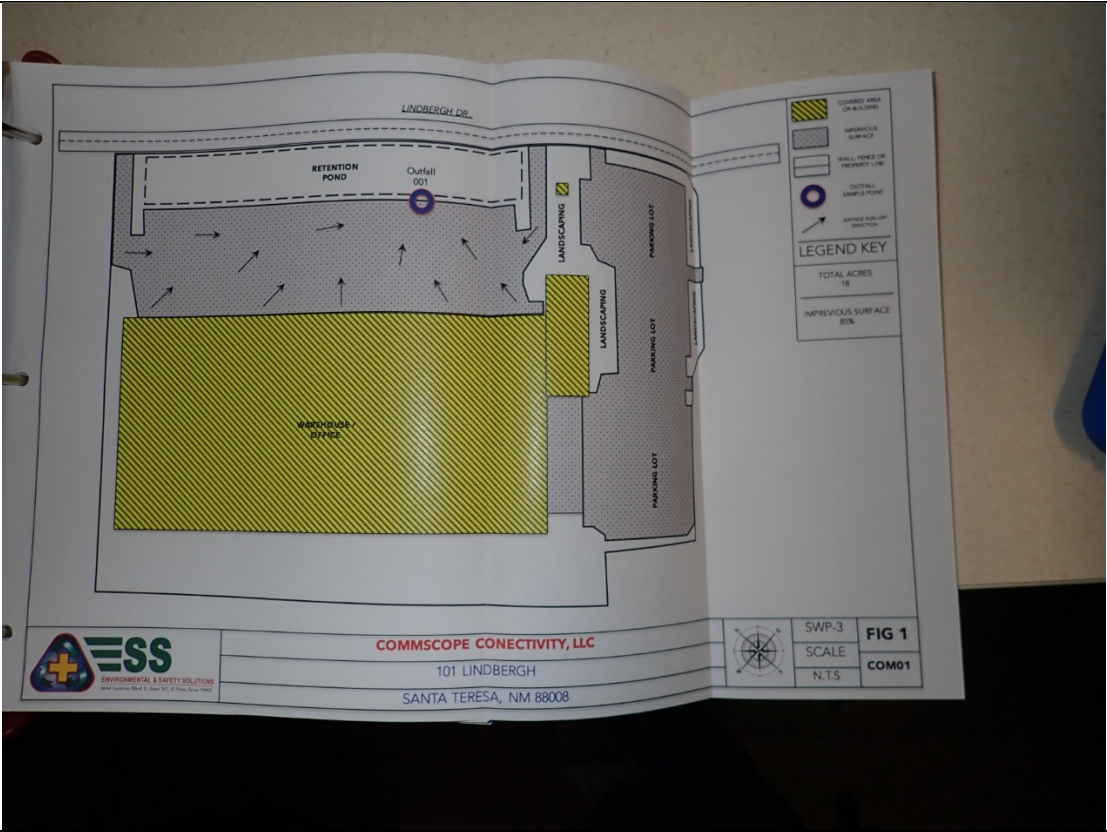
NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>One piece of leaky equipment was stored outdoors (photo 5). It was covered by 4/6/18 (attachment 2).</p> <p>On the day of the inspection, staff were not sure where the spill kit was located. A spill kit was placed by one of the generators 4/6/18 (attachment2).</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Facility is paved with curbs leading to a vegetated detention pond.</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Facility is paved with curbs leading to a vegetated detention pond.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>n/a</p>

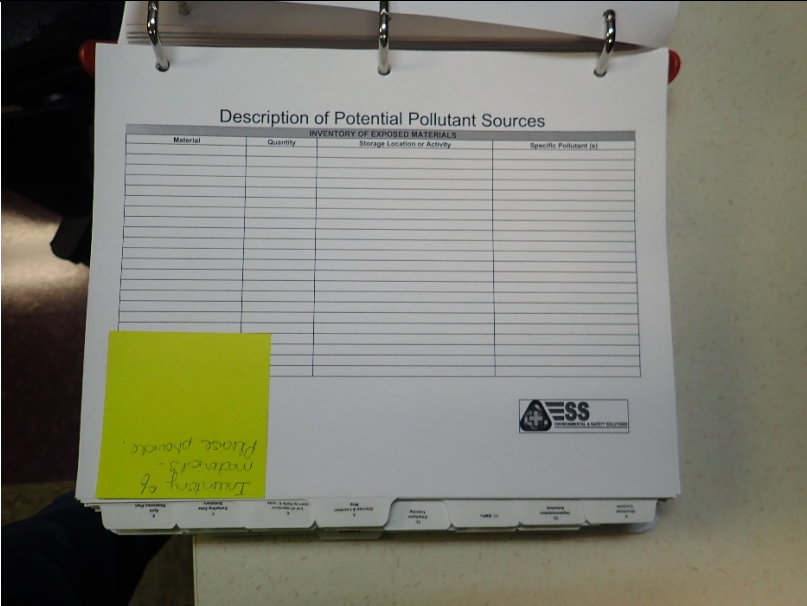
NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Dumpster was not covered and contained materials that could be windblown. (photo 6)</p>
Evidence of non-storm water discharges	<p>No non-stormwater discharges were observed at the time of the inspection</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Facility is paved.</p>

NMED/SWQB Official Photograph Log		
Photo # 1		
Photographer: Jennifer Foote	Date: 3/20/18	Time: approximately 3pm
City/County: Santa Teresa/Dona Ana	State: New Mexico	
Location: CommScope		
Subject: SWPPP site map		



NMED/SWQB Official Photograph Log		
Photo # 2		
Photographer: Jennifer Foote	Date: 3/20/18	Time: approximately 3pm
City/County: Santa Teresa/Dona Ana	State: New Mexico	
Location: CommScope		
Subject: Blank inventory of exposed materials		



NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Jennifer Foote	Date: 3/20/18	Time: approximately 3pm
City/County: Santa Teresa/Dona Ana	State: New Mexico	
Location: CommScope		
Subject: West rundown outlet. Sediment is windblown in from offsite.		



NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Jennifer Foote	Date: 3/20/18	Time: approximately 3pm
City/County: Santa Teresa/Dona Ana	State: New Mexico	
Location: CommScope		
Subject: East rundown/outfall001. There is also a rock covered inlet to storm drain system in center of pond.		



NMED/SWQB Official Photograph Log Photo # 5		
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Photographer: Jennifer Foote	Date: 3/20/18	Time: approximately 3pm
City/County: Santa Teresa/Dona Ana	State: New Mexico	
Location: CommScope		
Subject: leaking equipment, majority of storage such as cardboard occurs raised off the ground.		



NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Jennifer Foote	Date: 3/20/18	Time: approximately 3pm
City/County: Santa Teresa/Dona Ana		State: New Mexico
Location: CommScope		
Subject: uncovered dumpster		



Attachment 1

Storm events 0.25" and above from March 20 2017 to March 19, 2018

Location is approximately 4 miles east of facility

NM-DA-259
Santa Teresa 0.5 SSE
Lat: 31.849959
Lon: -106.635117

* indicates Multi-Day Accumulation Report

Station

NM-DA-259

Date	Precip in.
06/20/2017	0.29
07/23/2017	0.25
07/25/2017	0.39
08/12/2017	0.75
08/24/2017	0.26
09/27/2017	0.31
09/28/2017	3.36
12/18/2017	0.40
02/17/2018	0.61

For questions or comments concerning this web page please contact info@cocorahs.org.

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Attachment 2
Facility Response 4/6/18

Foote, Jennifer, NMENV

From: Gilbertson, Rhonda <Rhonda.Gilbertson@commscope.com>
Sent: Friday, April 6, 2018 11:17 AM
To: Foote, Jennifer, NMENV
Cc: Holcomb, Sarah, NMENV; Mata, Juan
Subject: Storm water Random Audit
Attachments: Pic 2 OP wrapped.jpeg; Wrapped OP - as requested during NM audit.jpeg; Spill kit outside by the Generators.jpeg

Importance: High

Hello Jennifer,

Per your recommendation during our inspection:

- the OP out in the truckyard has been wrapped in plastic (only the area identified by facilities that would have fluid), see attachment.
- Spill Kit placed outside next to the generators

Let me know if I can assist you with any questions/concerns you may have.

Thank You

COMMScope

Rhonda Gilbertson

EHS Coordinator

CommScope Connectivity LLC

101 Lindbergh

Santa Teresa NM 88008

Phone: +1-575-874-5446

Mobile: +1-915-258-9537

rhonda.gilbertson@commscope.com

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From: Foote, Jennifer, NMENV [<mailto:Jennifer.Foote@state.nm.us>]

Sent: Thursday, March 22, 2018 11:53 AM

To: Gilbertson, Rhonda <Rhonda.Gilbertson@commscope.com>

Subject: RE: Storm water Random Audit

Email Security Warning:

The following message was sent from an external e-mail address. Exercise caution when opening attachments, clicking links, or exchanging information.

Got it, thanks.

Jennifer Foote
Industrial and Stormwater Team Supervisor
Point Source Regulation Section
Phone:(505)827-0596
Fax: (505)827-0160
Jennifer.Foote@state.nm.us

From: Gilbertson, Rhonda [<mailto:Rhonda.Gilbertson@commscope.com>]

Sent: Wednesday, March 21, 2018 12:58 PM

To: Holcomb, Sarah, NMENV <sarah.holcomb@state.nm.us>; Foote, Jennifer, NMENV <Jennifer.Foote@state.nm.us>

Cc: Antonio Quintanilla <tony@esielpaso.com>; Mata, Juan <Juan.Mata@commscope.com>

Subject: Storm water Random Audit

Hello Sarah & Jennifer,

I started working on the items you provided during our audit recap, attached is the updated contact list.

Thank You

COMMScope

Rhonda Gilbertson

EHS Coordinator

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101 Lindbergh

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